

**EXHIBIT B**

**Kilgannon, John C.**

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**From:** Tom Muldoon <tpm@fsm-law.com>  
**Sent:** Tuesday, May 10, 2016 4:31 PM  
**To:** Kilgannon, John C.; 'DiDonato, Edward J.'  
**Subject:** RE: Campisi Construction Settlement Documents - FRE 408

John,

The Agreement is acceptable but needs a little clarification on:

6. Satisfaction of ECI Judgment, Garnishment Judgment And Dissolution of Vantage Attachment. Within five (5) days after the First Installment is honored for payment, ECI shall file (i) a Praecipe, in the form attached hereto as Exhibit B, dissolving the Vantage Attachment; and (ii) a Praecipis, in the form attached hereto as Exhibit C, marking the Garnishment Judgment and ECI Judgment satisfied with all costs paid and ECI shall cease and desist all garnishment efforts against Cornerstone.

John Anderson of Cornerstone has confirmed with Dave Spause that the ECI levy and garnishment is ECI's monies and falls outside of the \$100K Settlement, so this paragraph should read within 5 days of ECI receipt of the garnished fund, the matter will be dissolved and ended.

And the levy is not with Vantage, but Santander Bank.

Please confirm with your clients and let's get this one aspect cleaned up.

Thanks,

Tom

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**From:** Kilgannon, John C. [mailto:JCK@stevenslee.com]  
**Sent:** Monday, May 09, 2016 1:43 PM  
**To:** DiDonato, Edward J. <EDiDonato@foxrothschild.com>; Tom Muldoon (tpm@fsm-law.com) <tpm@fsm-law.com>  
**Cc:** Kilgannon, John C. <JCK@stevenslee.com>  
**Subject:** RE: Campisi Construction Settlement Documents - FRE 408

Thanks, let me follow up with my client. John

**John C. Kilgannon**

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**From:** DiDonato, Edward J. [<mailto:EDiDonato@foxrothschild.com>]

**Sent:** Monday, May 09, 2016 1:22 PM

**To:** Kilgannon, John C.; Tom Muldoon ([tpm@fsm-law.com](mailto:tpm@fsm-law.com))

**Subject:** FW: Campisi Construction Settlement Documents - FRE 408

Gentlemen - please advise .

**Edward J. DiDonato**

**Fox Rothschild, LLP**

(215) 299-2817 - direct

[edidonato@foxrothschild.com](mailto:edidonato@foxrothschild.com)

Business & Bankruptcy Law

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**From:** DiDonato, Edward J.

**Sent:** Monday, May 02, 2016 11:43 AM

**To:** Kilgannon, John C.; Tom Muldoon ([tpm@fsm-law.com](mailto:tpm@fsm-law.com))

**Subject:** FW: Campisi Construction Settlement Documents - FRE 408

John & Tom- the agreement is acceptable- please have it signed by your clients and return to me. ECI may sign a separate page and return to me - Once received , I will secure the trustees signature and file a motion for approval-

Thank you both . regards, ed

**Edward J. DiDonato**

**Fox Rothschild, LLP**

(215) 299-2817 - direct

[edidonato@foxrothschild.com](mailto:edidonato@foxrothschild.com)

Business & Bankruptcy Law

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**From:** Kilgannon, John C. [<mailto:JCK@stevenslee.com>]

**Sent:** Wednesday, April 20, 2016 9:52 AM

**To:** DiDonato, Edward J.; Tom Muldoon ([tpm@fsm-law.com](mailto:tpm@fsm-law.com))

**Cc:** Kilgannon, John C.; Daniel M. O'Donnell ([DODonnell@maloneylawoffice.com](mailto:DODonnell@maloneylawoffice.com))

**Subject:** Campisi Construction Settlement Documents - FRE 408

Ed and Tom:

Pursuant to my earlier emails and subject to FRE 408, I am forwarding a draft Settlement Agreement and Settlement Motion. Please note that my client reserves the right to make any revisions or amendments.

You will note that the payment structure was altered slightly at my client's request. I understand that Cornerstone's cash flow has changed over the past several months and, as such, Cornerstone asked that the initial payment be slightly modified to \$70,000 with two remaining installments of \$15,000 as specified in the draft.

Also, as I mentioned in my prior email, after the settlement is consummated, Cornerstone wants to avoid further litigation over a claims objection. Hence, I added language dealing with the claim issue. This issue may be moot if the Trustee does not anticipate distributions to unsecureds or it may be significant if distributions are expected. In any event, we can discuss the claim issue further.

Lastly, you will note that the settlement motion/order contemplates the issuance of an injunction under section 105 as a settlement bar against future claims.

Please let me know if you have any questions or comments.

Thanks

John

**John C. Kilgannon**

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